

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	Criminal Number 2:15-800
)	18 USC § 371
-versus-)	21 USC § 843(b)
)	
)	
ROBERTO BROWN)	INFORMATION
a/k/a "AB")	
DANIEL LITTLE)	
a/k/a "Daru")	

COUNT 1

THE UNITED STATES ATTORNEY CHARGES:

That beginning at a time unknown, but beginning at least in January 2012, and continuing thereafter, to and including the date of this Information, in the District of South Carolina, and elsewhere, the defendants, **ROBERTO BROWN, a/k/a "AB,"** and **DANIEL LITTLE, a/k/a "Daru,"** did knowingly and intentionally combine, conspire and agree with each other and others to possess with intent to distribute and to distribute cocaine and cocaine base, commonly known as "crack cocaine," both Schedule II controlled substances.

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and their co-conspirators committed the following overt act and other overt acts in the District of South Carolina, and elsewhere:

(a) Between the summer/fall of 2014 through January of 2015, the defendants, **ROBERTO BROWN, a/k/a "AB,"** and **DANIEL LITTLE, a/k/a "Daru,"** traveled from South Carolina to the Atlanta, Georgia area, with each other and another coconspirator, on several occasions to obtain cocaine; and

(b) Between the summer/fall of 2014 through January of 2015, the defendants **ROBERTO BROWN, a/k/a “AB,”** and **DANIEL LITTLE, a/k/a “Daru,”** worked together to sell cocaine in South Carolina to several cocaine dealers for profit.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES:

That between the dates of November 7, 2013 and November 10, 2013, in the District of South Carolina, the Defendants, **ROBERTO BROWN, a/k/a “AB,”** and **DANIEL LITTLE, a/k/a “Daru,”** as principals, aiders, abettors, and co-participants in jointly undertaken criminal activity, knowingly and intentionally did use a communication facility, that is, a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to possess with intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846;

All in violation of Title 21, United States Code, Section 843(b).



BETH DRAKE (nb)
ACTING UNITED STATES ATTORNEY